

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

**BOSTON GAS COMPANY d/b/a KEYSPAN ENERGY  
DELIVERY NEW ENGLAND**

**D.T.E. 03-40**

ATTORNEY GENERAL'S TWENTY-NINETH SET OF  
DOCUMENT AND INFORMATION REQUESTS

- AG-29-1 Refer to the Company's responses to AG-17-10 through AG-17-18. 220 CMR 12.04 (4) requires that the log of transactions "shall include the date of the transaction, the nature and quantity of the asset or service provided, the price charged and an explanation of how the price was derived. The responses do not appear to contain logs of individual transactions. Please provide the Company's definition of "transaction." If the Company maintains logs of individual transactions and some meaningful information that would address the nature and quantity of the service provided in each transaction, as well as, the pricing of the transaction, please provide that as was requested in AG-17-10 through AG-17-18. If the Company does not maintain the requested data, please provide copies of all waivers issued by the Department or other communications with the Department supporting the Company's summary reporting.
- AG-29-2 Refer to the Company's response to AG-8-14, Attachment AG-8-14 (b), Schedule 10, page 3. Please provide all computations, workpapers and assumptions supporting the peak day send out for each class. Provide all calculations as a working model in electronic spreadsheet form (Excel or Lotus compatible). Include a narrative explaining each step of the development of the peak day send out for each class.
- AG-29-3 Refer to Exhibit KEDNE/ALS-2, Schedule 10, page 3. Please provide all computations, workpapers and assumptions supporting the peak day send out for each class. Provide all calculations as a working model in electronic spreadsheet form (Excel or Lotus compatible). Include a narrative explaining each step of the development of the peak day send out for each class.
- AG-29-4 Refer to Exhibit KEDNE/ALS-2, Schedule 10, page 1. Please provide "Exhibits 8 and 9" referred to in footnotes 1 and 2. Include all supporting workpapers, calculations and assumptions.

- AG-29-5 Refer to Exhibit KEDNE/ALS-1, page 20. In the Company's last base rate case, were the rates that were initially put in place based on each class's tailblock being set at the marginal cost for each season? Please explain the basis for each exception.
- AG-29-6 Please explain how the Company's rates have evolved during the PBR period. Discuss specific rate design goals for each class and how the rate elements were changed in each annual filing. Specifically address how the Company's changes were consistent with the Department's design precedents of rate continuity, marginal pricing of the tailblock and the requirement that 50 percent of customers terminate in the headblock.
- AG-29-7 Refer to Exhibit KEDNE/ALS-1, page 21. If the Company believes, "The creation of a headblock rate...complicates the rate structure and moves it away from the principle of simplicity," please explain the basis for proposing a tailblock rate for the residential classes
- AG-29-8 If the Company has ever considered proposing flat volumetric rates (no block differences and not seasonally differentiated), please explain the rationale and what dissuaded the Company from such a proposal in this filing.
- AG-29-9 Please refer to Exhibit KEDNE/ALS-1, page 22. Please provide all analyses supporting the Company's proposal to collect all production and storage costs through the CGA. Include the studies supplied in D.P.U. 96-50 and explain the changes that have occurred between 1996 and 2002.
- AG-29-10 Please refer to the Company's response to AG-8-1 and Exhibit KEDNE/ALS-1, page 22. Please provide a clean and a redlined copy of the proposed CGA tariff. If there are any other tariffs that would necessarily change as the result of the proposed rates, terms or conditions contained in the filing, please provide copies of redlined tariffs reflecting the Company's proposals.
- AG-29-11 Refer to Exhibit KEDNE/ALS-1, page 33. Please provide a sample bill that reflects the implementation of the proposed WNC. Include all customer education materials and customer representative scripts that will be relied on to help customers with their understanding of their weather adjusted bills. Specifically address how the Company will explain that the weather used to normalize each customer's bill will be the weather experience at Logan Airport.
- AG-30-12 Please provide supplemental responses to each incomplete and / or non-responsive answer(s) to discovery issued by the Attorney General.

Dated: June 16, 2003